

FILED
07-02-2020
Clerk of Circuit Court
Brown County, WI
2020CV000646
Honorable Timothy A
Hinkfuss
Branch 7

STATE OF WISCONSIN: CIRCUIT COURT: BROWN COUNTY

GANNETT CO., INC., d/b/a USA
TODAY NETWORK-WISCONSIN
d/b/a GREEN BAY PRESS-GAZETTE
435 E. Walnut St.
Green Bay, Wisconsin 54301

and

DOUG SCHNEIDER, c/o GREEN
BAY PRESS-GAZETTE
435 E. Walnut St.
Green Bay, Wisconsin, 54301

Plaintiffs,

Case No.: _____

-vs.-

Case Classification: OTHER
EXTRAORDINARY WRIT

Case Code: 30954

BROWN COUNTY
305 E. Walnut St.
Green Bay, Wisconsin, 54303

and

JEFF FLYNT
Brown County Deputy Executive
Brown County
305 E. Walnut St.
Green Bay, Wisconsin, 54303,

Defendants.

SUMMONS

THE STATE OF WISCONSIN, To each person named as a Defendant:

You are hereby notified that the Plaintiff named above has filed a lawsuit or other

legal action against you. The Complaint, which is attached, states the nature and basis of the legal action.

Within forty-five (45) days of receiving this summons, you must respond with a written answer, as that term is used in Chapter 802 of the Wisconsin Statutes, to the Complaint. The Court may reject or disregard an answer that does not follow the requirements of the statutes. The answer must be sent or delivered to the Court, whose address is Brown County Clerk of Circuit Court, 100 S. Jefferson St., Green Bay, WI 54301, and to April Rockstead Barker, of Schott, Bublitz & Engel s.c., attorneys for the Plaintiff, whose address is 640 W. Moreland Boulevard, Waukesha, WI 53188. You may have an attorney help or represent you.

If you do not provide a proper answer within forty-five (45) days, the Court may grant judgment against you for the award of money or other legal action requested in the complaint, and you may lose your right to object to anything that is or may be incorrect in the complaint. A judgment may be enforced as provided by law. A judgment awarding money may become a lien against any real estate you own now or in the future, and may also be enforced by garnishment or seizure of property.

Dated this 2nd day of July, 2020.

Respectfully submitted,

/s/ April Rockstead Barker

April Rockstead Barker

State Bar #: 1026163

abarker@sbe-law.com

Attorneys for Plaintiff

SCHOTT, BUBLITZ & ENGEL s.c.

640 W. Moreland Boulevard

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COMPLAINT – PUBLIC RECORDS

This is an action to enforce Wisconsin's Public Records Law, Wis. Stats. §§19.31-19.39. State law declares it the public policy of this state that every citizen is presumptively entitled to complete access to the records of state and local government.

Plaintiffs, GANNETT CO., INC., d/b/a USA TODAY NETWORK-WISCONSIN d/b/a GREEN BAY PRESS-GAZETTE, and DOUG SCHNEIDER, by their attorneys, Schott, Bublitz & Engel s.c., as and for their claims under Wis. Stats. §19.37, allege that:

FACTUAL ALLEGATIONS

1. Plaintiff GANNETT CO., INC., d/b/a USA TODAY NETWORK-WISCONSIN d/b/a GREEN BAY PRESS-GAZETTE, is a corporation organized and existing under the laws of the State of Delaware and doing business as USA TODAY NETWORK-WISCONSIN at 435 E. Walnut Street, Green Bay, Wisconsin. Plaintiff GANNETT CO., INC., d/b/a USA TODAY NETWORK-WISCONSIN d/b/a GREEN BAY PRESS-GAZETTE (hereafter referenced collectively as "GREEN BAY PRESS-GAZETTE") publishes, among other things, newspapers with coverage of events in Green Bay, Wisconsin.

2. Plaintiff DOUG SCHNEIDER is an adult resident of the State of Wisconsin and a journalist employed by GREEN BAY PRESS-GAZETTE.

3. Defendant BROWN COUNTY is, upon information and belief, a political corporation organized under the laws of the State of Wisconsin, with its principal offices at 305 E. Walnut St., Green Bay, Wisconsin, and is an "authority" as that term is defined in Wis. Stats. §19.32(1) and used in the Public Records law.

4. Defendant JEFF FLYNT is the Deputy Executive of, and therefore, an employee or authorized legal representative of, Defendant BROWN COUNTY, and acted

at all times relevant to the allegations herein in his official capacity as Deputy Executive of BROWN COUNTY. Upon information and belief, JEFF FLYNT is a “legal custodian” of one or more of the records at issue in this action under Wis. Stats. §19.33 and as that term is used in the Public Records Law.

BACKGROUND AND RECORDS REQUESTS

5. On or about June 6, 2020, Plaintiffs DOUG SCHNEIDER and GREEN BAY PRESS-GAZETTE requested in writing, via electronic mail, that BROWN COUNTY and JEFF FLYNT, through their representatives, produce for inspection, among others, the following records relating to COVID investigations of businesses in Brown County:

- Names of businesses being investigated; and
- Breakdown of cases by business.

A true and correct copy of the pertinent portion of the communication that contained the written request is attached hereto as Exhibit 1.

6. On or about June 11, 2020, Defendants responded to Plaintiffs’ request by providing a heavily-redacted document that redacted the names of the businesses investigated and various “associated information” that was asserted to potentially reveal the names of businesses investigated. A true and correct copy of the Defendants’ response is attached hereto as Exhibit 2.

7. To date, the Defendants have not provided further or less redacted information in response to the requests described in this Complaint.

CLAIMS

8. Plaintiff realleges and reincorporates herein the allegations of paragraphs 1 through 7, above.

9. Under Wis. Stats. §19.31, it is the declared public policy of this state that every citizen is entitled to the greatest possible information regarding the affairs of government. Section 19.31, Wis. Stats., affirms the presumption of complete public access to governmental records, consistent with the conduct of governmental business. The statute provides that “[t]he denial of public access generally is contrary to the public interest, and only in an exceptional case may access be denied.” This is not an exceptional case.

10. Defendants have violated the Public Records Law and Wis. Stats. §19.37(1) by withholding, redacting and denying access to portions of records in response to Plaintiff’s records requests. Defendants’ reasons, as stated, for withholding the records violate the law because, among other things, (1) in one or more instances, Defendants improperly rely upon discredited alleged public policy rationales as “blanket exceptions” to disclosure; (2) in one or more instances, Defendants purport to apply the results of a purported public policy balancing analysis that neither considers nor determines whether the facts present an “exceptional case” against disclosure; and (3) Defendants have failed to assert reasons for non-disclosure that overcome the public interests in the release of the information redacted.

11. Defendants’ actions have caused and will continue to cause injury to the Plaintiffs in that they deprive them and the rest of the public of their rights under the Public Records Law.

RELIEF REQUESTED

WHEREFORE, the Plaintiffs demand a judgment of mandamus against the Defendants pursuant to Wis. Stats. §19.37(1):

1. Compelling the Defendants to permit the Plaintiffs forthwith to inspect and copy the requested records;
2. Declaring the Plaintiffs' rights and limiting the Defendants' conduct with respect to the requested records;
3. Awarding Plaintiffs their reasonable attorneys' fees under Wis. Stats. §19.37(2);
4. Awarding punitive damages as a result of the Defendants' willful violations of the Public Records law; and
5. Awarding such other relief as may be appropriate.

Dated this 2nd day of July, 2020.

/s/ April Rockstead Barker

April Rockstead Barker
State Bar #: 1026163
Attorneys for Plaintiffs
SCHOTT, BUBLITZ & ENGEL s.c.
640 W. Moreland Blvd.
Waukesha, WI 53188
(262) 827-1700
(262) 827-1701-Fax
abarker@sbe-law.com

Emails pertaining to Green Bay Press-Gazette requests for information on COVID-19 workplace outbreaks, prior to the formal records response:

From: Schneider, Doug

Sent: Saturday, June 6, 2020 2:13 PM

To: Flynt, Jeffrey G. <Jeffrey.Flynt@browncountywi.gov>; Hemery, David P. <david.hemery@browncountywi.gov>

Cc: Ebert, Karl <kebert@greenbay.gannett.com>

Subject: RE: Questions: COVID investigations as a state-high 40 businesses in Brown

Importance: High

Thanks, Jeff. Please consider this a request under Wisconsin's Open Records Law for the information the county has so far denied:

- Names of businesses being investigated.
- Breakdown of cases by business.
- Anything else you denied because you haven't performed a balancing test.

I'm copying corporation counsel so we can get the ball rolling.. Please let me know how long it'll take to get a response; the ask is now a week old.

Also I have to say it's extremely disappointing that after having known for a week that I was requesting this information, that county's response to date has been to:

- Tell me a specific health department employee will answer my questions.
- Have him start answering questions, stop because of another commitment, and say he'll be back in touch later that day.
- Not do that
- Claim the next day he's been directed to tell me that those questions can only be answered during the next county-wide conference call.
- Refuse to say who had issued the alleged directive.
- Require the questions in written form.
- Take a week to respond.
- Not answer three of the 10 questions, but not say why.
- Require a balancing test ... yet not conduct the balancing test.

You guys are better than this. Thanks.

Doug

The balancing test should consider:



CORPORATION COUNSEL

Brown County

305 EAST WALNUT STREET
P.O. BOX 23600
GREEN BAY, WISCONSIN 54305-3600



David P. Hemery
Corporation Counsel

PHONE: (920) 448-4006
FAX: (920) 448-4003
EMAIL: David.Hemery@co.brown.wi.us

June 11, 2020

Doug Schneider
Green Bay Press Gazette
Via Email To: DSCHNEID@greenbay.gannett.com

RE: Our Public Records Response to Your Public Records Request

Doug:

On 06-06-2020, you made a Public Records Request via email to Brown County Deputy Executive Jeff Flynt, as follows:

Please consider this a request under Wisconsin's Open Records Law for the information the county has so far denied: Names of businesses being investigated; and Breakdown of cases by business.

This is our response to your request.

Your request was analyzed per § 19.35(1)(a), Wis. Stats. A balancing test was conducted, weighing the strong public interest in disclosure against competing public interests in nondisclosure.

We have one spreadsheet/document from the State that was received on 06-02-2020 (the 'Investigation List') which contains responsive information.

It was determined that the public interest in **releasing** the following information from that document **outweighed** the public interest in redacting or withholding such information, and we are releasing the following information as described in the heading to each column on the responsive document: 1) Exposure County; 2) Jurisdiction; 3) Total Cases linked to Outbreak; 4) Total Deaths Linked to Outbreak; 5) Outbreak; 6) OB Process Status; 7) OB Resolution Status; 8) Outbreak Setting Category; 9) Facility Type; 10) Initial Notification Date; 11) Region; 12) IN Residents III; 13) IN Staff III; and 14) Onset Date.

It was also determined that the public interest in **redacting** the following information from that document **outweighed** the public interest in **releasing** such information, and we are redacting the following information as described in the heading to each column on the responsive document: 1) State ID; 2) WEDSS ID; 3) Outbreak Name Line List; 4) OB Outbreak ID; 5) Outbreak Name; 6) Facility Name; 7) Facility Address; 8) Facility City; and 9) From.



The reasons for withholding the names of the businesses/entities, as well as any associated information that may otherwise identify the businesses/entities, was recently stated by the Public Health Department as follows:

The fact that an individual has tested positive for COVID-19 does not automatically cause Public Health to identify where that individual works, or where that individual has shopped, recreated or eaten at, as those entities may have nothing to do with the individual testing positive. If Public Health becomes aware of information that suggests a facility/entity could be the cause of an individual testing positive for COVID-19 (e.g., due to unusually close working conditions and poor sanitary conditions), then an investigation ensues, and a determination whether to reveal the name of the facility/entity is made on a case -by-case basis after taking facts found during the investigation and various other factors into consideration.

That reasoning was considered when conducting the balancing test, and it was determined that the public interest in releasing the names of businesses/entities that simply employ an individual or individuals that tested positive for COVID-19, and may have contracted it elsewhere, was outweighed by the harm to the public interest that releasing such information could do. A business that does everything right, e.g., that engages in social distancing, utilizes PPE, sanitizes regularly, utilizes plexiglass barriers and follows other local, state and federal guidance and recommendations regarding preventing the spread of COVID-19, could find its operations negatively affected by such a release, through no fault of its own, to the point of closure, loss of jobs and other associated negative effects on the local community/public. Unemployment is at near record levels, and any further business/entity closings would negatively affect the local economy. Furthermore, businesses/entities that currently act as good public citizens by reporting positive COVID-19 cases they discover them (which then allows investigations to ensue, and recommendations to issue and be implemented in order to keep the public safe) may refrain from doing so if they know their business/entity will be released, even though they are fully complying with all recommendations, and that could have a chilling effect on the number of cases reported, which would negatively affect Public Health efforts to protect the public going forward.

In addition to redacting information that could be used to identify a specific business/entity, we also redacted the information in the "from" column, as releasing the name of the individual the information came from could also have a chilling effect on the number of cases reported, for the same reasons mentioned above, which would also negatively affect Public Health efforts to protect the public going forward, as described above.

The attached document does provide information you likely don't have which I hope you will find valuable, such as the Outbreak Setting Category and the Facility Type.

We inform you that, pursuant to § 19.37(1), Wis. Stats., you may bring an action for mandamus asking a court for a remedy (e.g., asking a court to order release of the requested records), and/or you may request in writing that the Brown County District Attorney, or the WI Attorney General, bring an action for mandamus.

Thank you for your inquiry.

Very Truly Yours,

/s/

David P. Hemery, Brown County Corporation
Counsel
WI Bar Number: 1033291

Exposure County	Jurisdiction	Status	WE DSS ID	Outbreak Name	Total Cases Linked To Outbreak	Total Deaths Linked To Outbreak	Outbreak Start Date	Outbreak End Date	Outbreak Duration (Days)	Outbreak Type	OB Re solution Status	Outbreak Category	Facility Type	Outbreak Name	Facility Address	Facility City	Initial Notification Date	Formio ID	Region	IN R eside nts I	IN Staf f I	Onset Date
Brown County	Brown County	New	Y es	4	1	Y es	1	1	0	Confr med	Group housin g facilit y	Adult Family Home (AFH)	Facility Nam e	Outb reak_ Name	Facility_A ddr es s	Facility_ City	4/27/ 2020	1	Northea stern	1	1	4/21/ 2020
Brown County	Brown County	New	Y es	2	Y es	Y es	1	1	0	Suspe ct	Group housin g facilit y	Adult Family Home (AFH) / Group Home	Facility Nam e	Outb reak_ Name	Facility_A ddr es s	Facility_ City	5/14/ 2020	1	Northea stern	1		5/9/2 020
Brown County	Brown County	Open Local Investig ation	Y es	7	3	Y es	1	1	0	Confr med	Group housin g facilit y	Homeless shelter	Facility Nam e	Outb reak_ Name	Facility_A ddr es s	Facility_ City	4/7/2 020	3	Northea stern	3	3	3/25/ 2020
Brown County	Brown County	Open Local Investig ation	Y es	9	1	Y es	1	1	0	Confr med	Group housin g facilit y	Other - Affordable Housing and Support for Men	Facility Nam e	Outb reak_ Name	Facility_A ddr es s	Facility_ City	4/22/ 2020	1	Northea stern	1		4/20/ 2020
Brown County	Brown County	Receive d by LHD	Y es	4	1	Y es	1	1	0	Confr med	Long- term care facilit y	Community Based Residential Facility (CBRF)	Facility Nam e	Outb reak_ Name	Facility_A ddr es s	Facility_ City	4/27/ 2020	1	Northea stern	0		4/23/ 2020
Brown County	Brown County	Open Local Investig ation	Y es	6	Y es	Y es	1	1	0	Confr med	Long- term care facilit y	Community Based Residential Facility (CBRF)	Facility Nam e	Outb reak_ Name	Facility_A ddr es s	Facility_ City	4/9/2 020	0	Northea stern	0	1	4/3/2 020
Brown County	Brown County	New	Y es	1	Y es	Y es	1	1	0	Confr med	Long- term care facilit y	Community Based Residential Facility (CBRF)	Facility Nam e	Outb reak_ Name	Facility_A ddr es s	Facility_ City	4/27/ 2020	1	Northea stern	1	1	4/21/ 2020
Brown County	Brown County	New	Y es	2	Y es	Y es	1	1	0	Confr med	Long- term care facilit y	Community Based Residential Facility (CBRF)	Facility Nam e	Outb reak_ Name	Facility_A ddr es s	Facility_ City	5/4/2 020	1	Northea stern	1		
Brown County	Brown County	New	Y es	2	Y es	Y es	1	1	0	Confr med	Long- term care facilit y	Community Based Residential Facility (CBRF)	Facility Nam e	Outb reak_ Name	Facility_A ddr es s	Facility_ City	5/4/2 020	1	Northea stern	1	1	4/25/ 2020

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	Bro wn	Bro wn Cou nty		2	Y es	New	Confir med	Long-term care facility	Community Based Residential Facility (CBRF)		5/1/2020	Northeastern	2	3/17/2020
Bro wn	Bro wn Cou nty			3	Y es	New	Suspe ct	Long-term care facility	Community Based Residential Facility (CBRF)		5/20/2020	Northeastern	1	3/17/2020
Bro wn	Bro wn Cou nty			4	Y es	New	Confir med	Long-term care facility	Community Based Residential Facility (CBRF)		5/1/2020	Northeastern	1	3/17/2020
Bro wn	Bro wn Cou nty			30	Y es	New	Confir med	Long-term care facility	Community Based Residential Facility (CBRF)		4/23/2020	Northeastern	3	4/13/2020
Bro wn	Bro wn Cou nty			1	Y es	Open Local Investigation	Confir med	Long-term care facility	Long-Term Care Facility, Unknown Type		5/1/2020	Northeastern	1	4/28/2020
Bro wn	Bro wn Cou nty			1	Y es	New	Confir med	Long-term care facility	Long-Term Care Facility, Unknown Type		4/27/2020	Northeastern	1	4/21/2020
Bro wn	Bro wn Cou nty			1	Y es	New	Suspe ct	Long-term care facility	Long-Term Care Facility, Unknown Type		5/13/2020	Northeastern	1	
Bro wn	Bro wn Cou nty			4	Y es	New	Confir med	Long-term care facility	Long-Term Care Facility, Unknown Type (non NH)		5/4/2020	Northeastern	1	
Bro wn	Bro wn Cou nty			2	Y es	Sent to State	Confir med	Long-term care facility	Nursing Home (Skilled Nursing Facility)		4/27/2020	Northeastern	1	4/20/2020
Bro wn	Bro wn Cou nty			4	Y es	New	Suspe ct	Long-term care facility	Nursing Home (Skilled Nursing Facility)		4/24/2020	Northeastern	2	4/15/2020
Bro wn	Bro wn Cou nty			2	No	New	Suspe ct	Long-term care facility	Other Retirement Community		5/11/2020	Northeastern	1	

















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[illegible]

Bro wn	Bro wn Cou nty							8	Y es	New	Confir med	Work place (non-health care)	Food production facility		5/13/2020		Northea stern	1	5/3/2020
Bro wn	Bro wn Cou nty							13	Y es	New	Confir med	Work place (non-health care)	Food production facility		5/4/2020		Northea stern	2	4/20/2020
Bro wn	Bro wn Cou nty							20	Y es	New	Confir med	Work place (non-health care)	Food production facility		5/1/2020		Northea stern	3	4/21/2020
Bro wn	Bro wn Cou nty							24	Y es	New	Confir med	Work place (non-health care)	Food production facility		5/1/2020		Northea stern	4	4/14/2020
Bro wn	Bro wn Cou nty							2	Y es	New	Confir med	Work place (non-health care)	Manufacturing facility		5/12/2020		Northea stern	2	4/3/2020
Bro wn	Bro wn Cou nty							2	Y es	New	Confir med	Work place (non-health care)	Manufacturing facility		5/12/2020		Northea stern	2	4/27/2020
Bro wn	Bro wn Cou nty							2	Y es	New	Confir med	Work place (non-health care)	Manufacturing facility		5/9/2020		Northea stern	2	4/23/2020
Bro wn	Bro wn Cou nty							3	Y es	New	Confir med	Work place (non-health care)	Manufacturing facility		5/9/2020		Northea stern	2	4/5/2020
Bro wn	Bro wn Cou nty							3	Y es	New	Confir med	Work place (non-health care)	Manufacturing facility		5/5/2020		Northea stern	2	4/28/2020
Bro wn	Bro wn Cou nty							4	Y es	New	Confir med	Work place (non-health care)	Manufacturing facility		5/13/2020		Northea stern	6	5/3/2020

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Bro wn	Bro wn Cou nty	5/12/2020	5	Yes	New	Confir med	Work place (non-health care)	Manufacturing facility	5/12/2020	4	4/23/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	7	Yes	New	Confir med	Work place (non-health care)	Manufacturing facility	5/12/2020	5	4/5/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	7	Yes	New	Confir med	Work place (non-health care)	Manufacturing facility	5/12/2020	2	4/10/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	11	Yes	New	Confir med	Work place (non-health care)	Manufacturing facility	5/12/2020	4	4/13/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	15	Yes	New	Confir med	Work place (non-health care)	Manufacturing facility	5/12/2020	3	4/19/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	6	Yes	Open Local Investigation	Confir med	Work place (non-health care)	Meat processing facility	4/23/2020	5	4/12/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	366	Yes	New	Confir med	Work place (non-health care)	Meat processing facility	4/15/2020	5	3/27/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	417	Yes	New	Confir med	Work place (non-health care)	Meat processing facility	4/13/2020	12	3/28/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	6	No	Received by LHD	Confir med	Work place (non-health care)	Office/Indoor Workplace	5/4/2020	1	4/22/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	2	Yes	New	Confir med	Work place (non-health care)	Office/Indoor Workplace	5/11/2020	2	4/24/2020	Northea stern
Bro wn	Bro wn Cou nty	5/12/2020	2	Yes	New	Confir med	Work place (non-health care)	Office/Indoor Workplace	5/11/2020	2	4/17/2020	Northea stern

Bro wn	Bro wn Cou nty			2	Y es	New	Confir med	Work place (non-health care)	Office/Indoor Workplace		5/12/ 2020		Northea stern	3	4/19/ 2020
Bro wn	Bro wn Cou nty			3	Y es	New	Confir med	Work place (non-health care)	Office/Indoor Workplace		5/15/ 2020		Northea stern	2	4/2/2 020
Bro wn	Bro wn Cou nty			3	Y es	New	Confir med	Work place (non-health care)	Office/Indoor Workplace		5/9/2 020		Northea stern	3	3/24/ 2020
Bro wn	Bro wn Cou nty			4	Y es	New	Suspe ct	Work place (non-health care)	Office/Indoor Workplace		5/12/ 020		Northea stern	4	4/17/ 2020
Bro wn	Bro wn Cou nty			3	Y es	New	Confir med	Work place (non-health care)	Other, commercial laundry services		5/15/ 2020		Northea stern	4	4/16/ 2020
Bro wn	Bro wn Cou nty			3	Y es	New	Confir med	Work place (non-health care)	Other, Grocery Store		5/9/2 020		Northea stern	2	4/20/ 2020
Bro wn	Bro wn Cou nty			2	Y es	New	Confir med	Work place (non-health care)	Other, Insulation installer		5/21/ 2020		Northea stern	2	5/10/ 2020
Bro wn	Bro wn Cou nty			6	Y es	New	Confir med	Work place (non-health care)	Other, Outdoor workspace		5/9/2 020		Northea stern	2	4/15/ 2020

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